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14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 SAN FRANCISCO DIVISION

18 MARY JENNINGS HEGAR, JENNIFER  
19 HUNT, ALEXANDRA ZOE BEDELL,  
20 COLLEEN FARRELL, AND SERVICE  
WOMEN'S ACTION NETWORK,

21 Plaintiffs,

22 vs.

23 ASHTON B. CARTER, Secretary of Defense,<sup>1</sup>

24 Defendant.

Case No. 12-CV-06005 EMC

**STIPULATED REQUEST AND  
[PROPOSED] ORDER FOR  
CONTINUANCE OF FURTHER CASE  
MANAGEMENT CONFERENCE AND  
UPDATED CMC STATEMENT**

Judge: Hon. Edward M. Chen

Case Management Conference: April 2, 2015  
Time: 10:30 a.m.

27 <sup>1</sup> Pursuant to Federal Rule of Civil Procedure 25(d), Ashton B. Barter has been substituted in his  
28 official capacity for Chuck Hagel as Secretary of Defense.

**STIPULATION**

Plaintiffs Mary Jennings Hegar, Jennifer Hunt, Alexandra Zoe Bedell, Colleen Farrell and Service Women's Action Network and Defendant Ashton B. Carter, Secretary of Defense ("Secretary") (collectively, "the parties"), by and through their respective counsel, submit this Stipulated Request and Proposed Order for a continuance of the Case Management Conference (CMC) scheduled for April 2, 2015, and deadline for the parties' updated joint CMC Statement, which is currently due March 26, 2015. Defendant respectfully requests a continuance of the CMC to April 23, 2015, and the deadline for the parties' updated joint CMC Statement to April 9, 2015, and the Plaintiffs stipulate to such request. Defendant submits that the following facts and circumstances set forth in the attached Declaration of counsel for Defendant Caroline Lewis Wolverton, establish good cause for the requested continuance as follows:

1. On November 13, 2014, the Court scheduled the further CMC in this matter for March 19, 2015, and ordered the parties to provide an updated joint CMC Statement by March 12, 2015. ECF No. 39.

2. Subsequently, Ms. Wolverton scheduled a family trip for the week of March 23, 2015, to coincide with her children's school spring break.

3. On January 27, 2015, the Court rescheduled the further CMC to April 2, 2015, and ordered the parties to provide an updated joint CMC Statement by March 26, 2015. (Dkt. Entry of Jan. 27, 2015)

4. The current March 26, 2015 deadline for the updated joint CMC Statement falls during the week of Ms. Wolverton's prescheduled family trip.

5. The requested continuance of the further CMC to April 23, 2015, and the updated Joint CMC Statement to April 9, 2015 would eliminate the conflict the current updated joint CMC Statement deadline presents for Ms. Wolverton.

6. Plaintiffs' counsel would have a conflict with the further CMC being rescheduled to April 9, 2015, as that date falls during the Passover holiday.<sup>2</sup> The Court's scheduling notes on the Court website indicate that the Court is unavailable on April 16, 2015.

7. In light of the foregoing, Defendant respectfully requests that the Court continue the Case Management Conference to April 23, 2015, and the deadline for the parties' updated joint CMC Statement to April 9, 2015.

DATED: February 24, 2015

MUNGER, TOLLES & OLSON LLP

By: /s/ Rosemarie T. Ring  
ROSEMARIE T. RING

DATED: February 24, 2015

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<sup>2</sup> Plaintiffs' counsel would be able to file the updated Case Management Statement on April 9, 2015.

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4  
5 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

6 I, Caroline Lewis Wolverton, am the ECF User whose identification and password are  
7 being used to file this STIPULATED REQUEST AND [PROPOSED] ORDER FOR  
8 CONTINUANCE OF FURTHER CASE MANAGEMENT CONFERENCE AND UPDATED  
9 CASE MANAGEMENT STATEMENT. In compliance with General Order 45.X.B, I hereby  
10 attest that all signatories have concurred in this filing.

11  
12 /s/ Caroline Lewis Wolverton

1 **[~~PROPOSED~~] ORDER**

2 Pursuant to the stipulated request, and based on good cause shown, it is hereby

3 ORDERED that the Stipulated Request and [Proposed] Order for Continuance of Further  
4 Case Management Conference and Updated CMC Statement is hereby GRANTED; and it is  
5 further

6 ORDERED that the further Case Management Conference is CONTINUED to April 23,  
7 /at 10:30 a.m.  
8 2015, and the deadline for the parties Updated Joint CMC Statement is CONTINUED to April 9,  
9 2015.

10 Dated: 2/25/15

